



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET
STATE PLANNING COORDINATION

November 14, 2005

Mr. Charles White, Jr.
Stolz Realty
3704 Kennett Pike, Ste. 200
Greenville, DE 19807

RE: PLUS review – PLUS 2005-10-04; River Bend

Dear Mr. White:

Thank you for meeting with State agency planners on October 26, 2005 to discuss the proposed plans for the River bend project to be located on the west side of Route 9, south of Route 7.

According to the information received, you are seeking rezoning through the City of New Castle for 210 residential units on 150 acres.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as the City of New Castle is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the City.

Executive Summary

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The

full text of this letter represents the official state response to this project. ***Our office notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.***

State Strategies/Project Location

The project is located in Investment Level 1 according to the State Strategies for Policies and Spending, and as such the State supports development in this area. That said, we do caution against any further loss of industrially zoned land as noted under the Department of Economic Development's (DEDO) comments.

As was noted at this meeting, if the rezoning makes the subject parcel inconsistent with the City's current comprehensive plan then the City of New Castle will have to amend this comprehensive plan prior to rezoning the parcel. It should be noted that the plan amendment will not have to go through a PLUS review due to the Memorandum of Understanding (MOU) the City has with our office in that the change can be seen as a *de minimis* variance from the comprehensive plan as the rezoning presents a unique situation given that the parcel is undeveloped and there are other residential developments in the vicinity of this property. Please inform this office of your intentions in this regard.

Street Design and Transportation

- The plan depends on using a two-lane road of about 1,000 feet for all access in and out of the proposed development and the back two-thirds are separated from the front third by another road segment that is almost as long. If the City finds rezoning to residential use appropriate, DelDOT would recommend that they require the developer to pursue an emergency (only) access to the site from the Centerpoint Industrial Park on the opposite side of the railroad tracks
- While it appears that a small landscape buffer is proposed, some of the proposed house lots would still be quite close to the railroad line and the industrial buildings on the other side. DelDOT would recommend that they require the developer to provide additional buffering, including berms, landscaping or both, to shield the residents from the noise and lights associated with such uses. As a safety measure, they recommend that a fence be included in this buffer.
- A sidewalk should be provided along their access road leading out to Route 9.
- The river walk along the Delaware would probably be a desirable destination for residents of the development, and if a direct pedestrian connection can be made safely, the developer should be required to do so

Natural and Cultural Resources

- Because there is strong evidence that federally regulated wetlands exist on site, a wetland delineation, in accordance with the methodology established by the Corps of Engineers Wetlands Delineation Manual, (Technical Report Y-87-1) should be conducted. Once complete, this delineation should be verified by the Corps of Engineers through the Jurisdictional Determination process.
- Lots should be removed in their entirety from the wetland areas. Vegetated buffers comprised of native trees, shrubs or no-mow grasses, of no less than 100 feet should be employed from the edge of the wetland complex.

The following are a complete list of comments received by State agencies:

Office of State Planning Coordination – Contact: Herb Inden 577-5188

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Division of Historic and Cultural Affairs – Contact: Alice Guerrant 739-5685

This parcel has a known prehistoric-period archaeological site (N-14022) within it. There may be others. The potential for later historic-period archaeological sites is low, although there could be an early historic-period site in this area. The historic workers' community of Dobbinsville (N-400) is nearby.

The approach to this project area is over marsh, and the proposed gazebo is in marsh. This project will almost certainly require an Army Corps of Engineers' permit, which

will mean that the developer will have to consult with this office under Section 106 of the National Historic Preservation Act (as amended). Depending on the area of potential effect, the developer may be required to hire a consultant to perform archaeological survey and/or data recovery. The State Historic Preservation Office will be happy to help the developer through this process. If no permit is required, they would like the opportunity to check the area for other archaeological sites and learn something more about the extent and nature of the known site before any ground-disturbing activities take place. In addition, we would like sufficient landscaping so that the view of this project from Dobbinsville is screened.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- 1) The plan depends on using a two-lane road of about 1,000 feet for all access in and out of the proposed development and the back two-thirds are separated from the front third by another road segment that is almost as long. While this arrangement appears to be the best access possible given the constraints of the site, it is less than desirable for emergency access. If the City finds rezoning to residential use appropriate, DelDOT would recommend that they require the developer to pursue an emergency (only) access to the site from the Centerpoint Industrial Park on the opposite side of the railroad tracks. In considering the rezoning, they should consider whether such an access is feasible.
- 2) While it appears that a small landscape buffer is proposed, some of the proposed house lots would still be quite close to the railroad line and the industrial buildings on the other side. If the City finds rezoning to residential use appropriate, DelDOT would recommend that they require the developer to provide additional buffering, including berms, landscaping or both, to shield the residents from the noise and lights associated with such uses. As a safety measure, they recommend that a fence be included in this buffer.
- 3) DelDOT recommends that the developer be required to provide a sidewalk along their access road leading out to Route 9.
- 4) The river walk along the Delaware would probably be a desirable destination for residents of the development, and if a direct pedestrian connection can be made safely, the developer should be required to do so. Possible obstacles include sight distance for a pedestrian crossing on Route 9 and availability of right-of-way between Route 9 and the river. If a direct connection is not possible, the developer should be required to provide a sidewalk connection to the Dobbinsville community, located to the east on Route 9. There are two paths leading from there to the river walk.

- 5) While the proposed pier on Army Creek is not, primarily a transportation concern, DelDOT reminds the developer that the bridge carrying Route 9 over Army Creek is a low one and there is a tide gate downstream of it. Residents boating from this pier would be unable to access the Delaware River.
- 6) If the City approves the needed rezoning, the developer's site engineer should contact the Subdivision Manager for New Castle County, Mr. Richard Woodhall, regarding DelDOT requirements for the site entrance. Mr. Woodhall may be reached at (302) 760-2262.

The Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-9071

Soils

Based on New Castle County soil survey mapping, Matapeake and Tidal Marsh were mapped on subject parcel. Matapeake is a well-drained upland soil that, generally, has few limitations for development. Tidal Marsh is a very poorly-drained wetland-associated (hydric) soil that has the highest level of severity for development. Approximately two-thirds of subject parcel's land area was mapped as Tidal Marsh.

Wetlands

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of estuarine and palustrine wetlands on this parcel. Site plans indicate that wetlands will be directly impacted by road crossings.

The developer and County should note that impacts to these wetlands are regulated by both the DNREC Wetlands and Subaqueous Lands Section and the Army Corps of Engineers through the Delaware Subaqueous Lands Act and Section 404 of the Federal Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits from the Army Corps of Engineers also require 401 Water Quality Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Programs Section. Each of these certifications represents a separate permitting process.

Because there is strong evidence that federally regulated wetlands exist on site, a wetland delineation, in accordance with the methodology established by the Corps of Engineers Wetlands Delineation Manual, (Technical Report Y-87-1) should be conducted. Once

complete, this delineation should be verified by the Corps of Engineers through the Jurisdictional Determination process.

To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting. These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302) 739-4691 to schedule a meeting.

Lots should be removed in their entirety from the wetland areas. Vegetated buffers comprised of native trees, shrubs or no-mow grasses, of no less than 100 feet should be employed from the edge of the wetland complex. The developer should note that both DNREC and Army Corps of Engineers discourage allowing lot lines to contain wetlands to minimize potential cumulative impacts resulting from unauthorized and/or illegal activities and disturbances that can be caused by homeowners.

This project is located directly adjacent to sensitive waters and wetlands associated with the Army Creek watershed – greatly increasing the probability of harmful impacts to surface and groundwater quality of all waters within the greater Delaware Basin - making it more difficult for the State to achieve future required TMDL nutrient reductions. In recognition of this concern, the Watershed Assessment Section strongly recommends that the applicant consider preserving the existing forested buffer in adjoining said wetlands in their entirety. Otherwise, as mentioned previously, a 100-foot upland buffer width is the recommended minimum. Efforts to expand the existing buffer width beyond the recommended 100-foot minimum (where applicable) via plantings of native woody and herbaceous vegetation, would be greatly appreciated. It is also strongly recommended that lot lines be removed from all wetlands or buffers.

Water Access

A conservation easement or other means of land protection and a single community water access is better for protecting water quality than individual piers and or structures. Any work involving the wetlands, water access, piers or docks will require permits from the State of Delaware and or the Army Corps of Engineers, a State Water Quality Certification and a Coastal Zone Federal Consistency Certification. These are separate permit actions and the Joint Permit Processing Committee is recommended. Contact the Wetlands and Subaqueous Lands Section at (302) 739-9943 for information and a committee review if needed.

TMDLs

A Total Maximum Daily Load (TMDL) is the maximum level of pollution for which a water quality limited water body can assimilate without compromising use and recreational goals such as swimming, fishing, drinking water, and shell fish harvesting. Although TMDLs as a “pollution runoff mitigation strategy” to reduce nutrient loading have not yet been developed for the Army Creek watershed to date, work is continuing on their development and they should be completed by December 2006.

Therefore, until the specified TMDL reductions and pollution control strategies are adopted, it shall be incumbent upon the developer to employ best available technologies (BATs) and/or best management practices (BMPs) as “methodological mitigative strategies” to reduce degradative impacts associated with development. Reducing imperviousness, preservation and/or planting trees, and maintaining at least a 100-foot upland buffer from all streams and wetlands are some examples of mitigative strategies to reduce nutrient runoff impacts.

Impervious Cover

Since residential development significantly increases the amount of impervious cover - leading to large volumes of contaminant-laden runoff which ultimately drain into streams or waterways - the applicant is strongly urged to pursue both natural and constructed Best Management Practices (BMPs) to reduce such impacts. Reducing the amount of impervious surfaces by planting/preserving more trees and the use of pervious paving surfaces (“pavers”) in lieu of asphalt or concrete (where applicable) - are examples of ways to reduce such impacts. Research has consistently shown that once a watershed exceeds a threshold of 10 percent imperviousness, water and habitat quality irreversibly decline.

Water Supply

The Division of Water Resources will consider applications for the construction of on-site wells provided the wells can be constructed and located in compliance with all requirements of the Regulations Governing the Construction and Use of Wells. A well construction permit must be obtained prior to constructing any well(s).

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-9944.

Sediment and Erosion Control/Stormwater Management

A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. The plan review and approval as well as construction inspection will be coordinated through **New Castle Conservation District**. Contact them at (302) 832-3100 for details regarding submittal requirements and fees.

As of April 11, 2005, stormwater best management practices must also consider water quality as well as quantity in impaired water bodies.

Floodplains

Portions of the property are located within the 100-year floodplain and should be left as open space.

Open Space

To maximize the existing buffering capacity and wildlife habitat on site, it is recommended that the developer minimize the amount of wetland degradation by providing 100-foot buffers from all wetlands and water bodies.

In areas set aside for passive open space, the developer is encouraged to consider establishment of additional forested areas or meadow-type grasses. Once established, these ecosystems provide increased water infiltration into groundwater, decreased run-off into surface water, air quality improvements, and require much less maintenance than traditional turf grass, an important consideration if a homeowners association will take over responsibility for maintenance of community open spaces.

Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism. Conservation areas should also be demarked to avoid infringement by homeowners.

Rare Species/Site Visit Request

DNREC has never surveyed this parcel, but there is a potential for rare plants as the wetlands along Army Creek were historically highly productive. There are records of Regal fritillary (*Speyeria idalia*) in the vicinity and it may occur at this site because it inhabits marshes and wet meadows. This state-rare butterfly prefers to feed upon milkweed and thistle although it may utilize other plants for egg laying. So that we can provide more informed recommendations, our program botanist requests the opportunity to survey the wetlands on this site. His observations would also allow the applicant the opportunity to reduce potential impacts to rare species. Please contact Bill McAvoy at (302) 653-2880.

Nuisance Waterfowl

Stormwater management ponds included in the site plan may attract waterfowl like resident Canada geese and mute swans. High concentrations of waterfowl in ponds create water-quality problems, leave droppings on lawn and paved areas and can become aggressive during the nesting season. Short manicured lawns around ponds provide an attractive habitat for these species. We recommend native plantings of tall grasses, wildflowers, shrubs, and trees at the edge and within a buffer area (50 feet) around the perimeter. Waterfowl do not feel safe when they can not see the surrounding area for possible predators. These plantings should be completed as soon as possible as it is easier to deter geese when there are only a few than it is to remove them once they become plentiful. The Division of Fish and Wildlife does not provide goose control services, and if problems arise, residents or the home-owners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with proper landscaping, monitoring, and other techniques, geese problems can be minimized.

Mosquito Control

Development projects within 1 mile of large tracts of freshwater wetlands, can often lead to increased demands by the public (and their elected officials) for mosquito control services, going beyond what DNREC's Mosquito Control Section currently has the budget or resources to provide. Adverse impacts upon the State's allocation of public funds for mosquito control services must be realistically recognized as the frequent consequence of approving these types of development projects; and State and local governments should then be prepared to deal with the increased budget demands for mosquito control services. Additionally, even though the EPA has scientifically determined that EPA-registered mosquito control insecticides can be applied "without

posing any unreasonable risks to human health, wildlife or the environment” (when used in accordance with all product label instructions), avoiding or reducing the use of such pesticides should be employed whenever possible. Limiting development that is too close to wetlands will aide in achieving a reduction in pesticide use.

Underground Storage Tanks

There is three inactive LUST site(s) located near the proposed project:

Johnson Controls, Facility # 3-000439, Project #N9303058

Dureco Chemicals, Inc., Facility # 3-001231, Project # N9109205

Ameco Chemical Plant, Facility # #-000107, Project # N9411250

No environmental impact is expected from the above inactive/active LUST site(s). However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would be need to be changed due to petroleum contamination. However, should any unanticipated contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel with nitrile rubber gaskets in the contaminated areas.

Site Investigation and Restoration

6 SIRB sites were found within a half mile radius of the proposed site:

1. Belleca Hanger (DE-1061) is located north of the proposed site. The site came to DNREC's attention when an anonymous letter was written stating that waste materials were buried onsite. A phase I investigation was launched, and a conducted survey revealed buried materials. A work plan has been approved for an investigation and the investigation is still ongoing. There are no comments at this point pending the results of investigation. If you come across any hazardous material during construction, please contact DNREC.
2. Shcmalbach Pump house (DE- 1297) is located north of proposed site. Elevated TCE level above mcl was found in a monitoring well. DNREC has no comment at this time because negotiations continue. If you come across any hazardous material during construction, please contact DNREC.
3. Dobbinsville Ballfield (DE-1150) No Further Action (NFA) was taken. Therefore, DNREC-SIRB does not foresee any negative impact on the proposed site.

4. Abex Corn (AMSCO) landfill is located south of proposed site. A Preliminary Assessment (PA) was conducted in 1983. Elevated levels of sodium and manganese above mcl was discovered, but they were not considered toxic. No Further Action (NFA) was recommended and DNREC-SIRB does not foresee any negative impact on the proposed site.
5. Deemer Steel (DE-1244, 1245) OU2 and OU3: COCR was signed in august 2005. All applicable remedy has been completed. DNREC-SIRB does not foresee any negative impact on the proposed site.
6. Former Amoco Polymer Plant (Dureco) (DE-0084) is located southwest of the proposed site. VOCs were discovered in ground water. DNREC-SIRB foresees no negative impact since the proposed site is not in the direction of ground water flow.

If you have any questions regarding these comments, please contact Babatunde Asere at 302-395-2600.

Solid Waste

Each Delaware household generates approximately 3,600 pounds of solid waste per year. On average, each new house constructed generates an additional 10,000 pounds of construction waste. Due to Delaware's present rate of growth and the impact that growth will have on the state's existing landfill capacity, the applicant is requested to be aware of the impact this project will have on the State's limited landfill resources and, to the extent possible, take steps to minimize the amount of construction waste associated with this development.

Air Quality

Once complete, vehicle emissions associated with this project are estimated to be 16.1 tons (32,232.8 pounds) per year of VOC (volatile organic compounds), 13.3 tons (26,686.6 pounds) per year of NOx (nitrogen oxides), 9.8 tons (19,689.9 pounds) per year of SO2 (sulfur dioxide), 0.9 ton (1,752.7 pounds) per year of fine particulates and 1,348.1 tons (2,696,233.4 pounds) per year of CO2 (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 6.5 tons (13,001.0 pounds) per year of VOC (volatile organic compounds), 0.7 ton (1,430.5 pounds) per year of NOx (nitrogen oxides), 0.6 ton (1,187.1 pounds) per year of SO2 (sulfur dioxide), 0.8 ton (1,531.9 pounds) per year of fine particulates and 26.4 tons

(52,703.0 pounds) per year of CO₂ (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 2.6 tons (5,152.6 pounds) per year of NO_x (nitrogen oxides), 9.0 tons (17,922.2 pounds) per year of SO₂ (sulfur dioxide) and 1,321.8 tons (2,643,530.4 pounds) per year of CO₂ (carbon dioxide).

	VOC	NO _x	SO ₂	PM _{2.5}	CO ₂
Mobile	16.1	13.3	9.8	0.9	1348.1
Residential	6.5	0.7	0.6	0.8	26.4
Electrical Power		2.6	9.0		1321.8
TOTAL	22.6	16.6	19.4	1.7	2696.3

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 2.6 tons of nitrogen oxides per year and 9.0 tons of sulfur dioxide per year.

A significant method to mitigate this impact would be to require the builder to construct Energy Star qualified homes. Every percentage of increased energy efficiency translates into a percent reduction in pollution. Quoting from their webpage, <http://www.energystar.gov/>:

“ENERGY STAR qualified homes are independently verified to be at least 30% more energy efficient than homes built to the 1993 national Model Energy Code or 15% more efficient than state energy code, whichever is more rigorous. These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of:

building envelope upgrades,
high performance windows,
controlled air infiltration,
upgraded heating and air conditioning systems,
tight duct systems and
upgraded water-heating equipment.”

The Energy Office in DNREC is in the process of training builders in making their structures more energy efficient. The Energy Star Program is excellent way to save on energy costs and reduce air pollution. We highly recommend this project development and other residential proposals increase the energy efficiency of their homes.

They also recommend that the home builders offer geothermal and photo voltaic energy options. Applicable vehicles should use retrofitted diesel engines during construction. The development should provide tie-ins to the nearest bike paths, links to mass transit, and fund a lawnmower exchange program for their new occupants.

State Fire Marshal's Office – Contact: Duane Fox

The State Fire Marshall has no comments on this proposal because it is within the City limits of New Castle and will be reviewed by their Fire Marshall's Office. (DSFPR):

Public Service Commission - Contact: Andrea Maucher 739-4247

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

Delaware State Housing Authority – Contact Jimmy Atkins 739-4263

As a general planning practice, DSHA encourages residential development in these areas where residents will have proximity to services, markets, and employment opportunities. While DSHA supports proposals that create housing opportunities for seniors, the location of the development, because of its close proximity to existing railroad and industrial land, raises serious health, safety, and environmental concerns for the future residents of the development. Seniors require additional health, transportation, and other support services to enable them to remain active and independent. The development as proposed is not the most suitable site for senior housing and may be difficult to service by fire, police, and other emergency personnel.

Delaware Department of Agriculture – Contact: Milton Melendez 739-4811

The Delaware Department of Agriculture has no objections to the River Bend application. The site is located on a long-range designated growth area. The *Strategies for State Policies and Spending* encourages environmentally sensitive development in areas within a Growth Level 1 Zone.

Forest Buffer Requirements

The Delaware Forest Service would ask the Developer to consider a 100' forest/agricultural buffer or to develop a buffer design in compliance with the New Castle County UDC when developing this parcel to lessen impact to the water resources and other properties adjacent to this site.

Right Tree for the Right Place

The Delaware Department of Agriculture Forest Service encourages the developer to use the “Right Tree for the Right Place” for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

Native Landscapes

The Delaware Department of Agriculture and the Delaware Forest Service encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and will clean our rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to our local landscapes, please contact the Delaware Department of Agriculture Plant Industry Section at (302) 698-4500.

Wild Land Fire Danger Mitigation

The Delaware Forest Service encourages the developer to implement fire friendly landscape designs which lessen the danger for wildfires on this parcel. These concepts and designs mirror the *Right Tree for the Right Place* and the *Native Landscapes* comments provided by this office; as well as opportunities to implement community restriction which prevent dumping within the adjacent marsh on this property. To assist with these concepts please contact our office at (302) 349-5754.

Delaware Economic Development Office – Contact: Gary Smith 739-4271

The Delaware Economic Development Office strongly opposes the rezoning of industrial property to residential within the City of New Castle. The State of Delaware has only a few properties that are zoned industrial that are above 80 acres. We are quickly running out of opportunities to show clients large tracts of land as they are becoming rezoned residential. In order for the state to be vibrant economically we must have the ability to recruit new companies to the state. This rezoning will impact our ability to do this.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of

State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

A handwritten signature in blue ink that reads "Constance C. Holland". The signature is fluid and cursive, with the first name "Constance" being the most prominent.

Constance C. Holland, AICP
Director

CC: City of New Castle